

October 27, 2008

Stephen F. Mecham
Callister Nebeker & McCullough
10 East South Temple, Suite 900
Salt Lake City, Utah 84133

Re: Request to Change Rule 746-360-2 C, PSC Docket No. 08-R360-01

Dear Mr. Mecham,

The Commission has reviewed your request, filed on behalf of the Utah Rural Telecom Association, to amend Utah Administrative Rule 746-360-2 to change the definition of basic telecommunication service. After careful consideration of the request, the Commission has concluded to deny the request. It does so in anticipation of the resolution of the treatment of internet protocol services (VOIP) and their impact on telecommunications providers, which is expected from the Federal Communications Commission (FCC). FCC Chairman Martin has also recently released proposals to be considered by the FCC, scheduled for early November, concerning changes in the Federal Universal Service Fund and intercarrier compensation changes which are directed to factors prompting your suggestion for the rule change. The Commission desires to see what changes arise from the federal government's efforts. This will help determine what needs may appropriately be addressed through state rulemaking and use of state universal service funds.

If you have further comments or questions concerning this matter, you may contact me by phone at (801)530-6716 or email at jorchard@utah.gov.

Sincerely,

/s/ Julie Orchard
Commission Secretary